

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DEBBIE ANN BROMFIELD-THOMPSON,

Plaintiff,

v.

AMERICAN UNIVERSITY OF  
ANTIGUA/MANIPAL EDUCATION  
AMERICAS, LLC A/K/A GCLR, LLC, AND  
NBME,

Defendants.

Civil Case No.: 19-CV-6078

**DECLARATION OF LEONARD A. SCLAFANI**

I, Leonard A. Sclafani, declare, pursuant to 28 U.S.C. § 1746, under the penalty of perjury, as follows:

1. I am the Senior Vice President and General Counsel of Manipal Education Americas, LLC (“MEA”).

2. I submit this declaration in support of the Motion to Dismiss the Complaint by Defendants American University of Antigua and Manipal Education Americas, LLC. I have personal knowledge of the matters set forth in this declaration.

3. American University of Antigua (“AUA”) is an educational entity in Antigua. It has no offices in the United States. MEA is a separate entity that provides back office and administrative services, such as accounting, finance and registrarial services, for institutions of higher education worldwide. AUA is one such institution. MEA provides back office and administrative services to AUA under a services contract. MEA does not make substantive, academic decisions regarding AUA’s students. A true and correct copy of the AUA-MEA services contract is attached hereto as Ex. 1.

4. On or about October 9, 2019, I was given a copy of Plaintiff's Summons and Complaint in this matter by Anita O'Brien.<sup>1</sup> Ms. O'Brien is an administrative assistant at MEA in its offices here in New York. Ms. O'Brien is not authorized to accept service on behalf of AUA.

Dated: New York, New York  
December 6, 2019

  
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Leonard A. Sclafani

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1. Contrary to what is stated in Plaintiff's Proof of Service (Dkt. No. 11), Ms. O'Brien does not work in, or provide services for, MEA's Legal Department.